

EXHIBIT B

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

4 IN RE: NATIONAL)
5 PRESCRIPTION) MDL No. 2804
6 OPIATE LITIGATION)
7 _____) Case No.
8) 1:17-MD-2804
9)
10 THIS DOCUMENT RELATES TO:) Hon. Dan A.
11 CASE TRACK THREE) Polster
12

13 FRIDAY, MAY 14, 2021

14 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
15 CONFIDENTIALITY REVIEW

16 - - -

17 Remote videotaped deposition of
18 Nicole Harrington, held at the location of
19 the witness in Nashua, New Hampshire,
20 commencing at 9:07 a.m. Eastern Time, on the
21 above date, before Carrie A. Campbell,
22 Registered Diplomat Reporter, Certified
23 and Realtime Reporter.

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1 reflection of a title that USA Today
2 wrote.

3 QUESTIONS BY MR. LANIER:

4 Q. Wait, that title is a
5 reflection of a title USA Today wrote?

6 A. Yes, these are -- {audio
7 interruption} news articles. The titles were
8 by USA Today.

9 Q. Well, is USA Today writing your
10 LinkedIn page, or did you write it?

11 A. That was just a hyperlinked
12 article that I attached to the LinkedIn page.

13 Q. Yeah. The key there is that
14 you attached. USA Today isn't hacking into
15 your LinkedIn account using this stuff and
16 posting, are they?

17 MR. HYNES: Objection. Form.

18 THE WITNESS: No. No, but they
19 wrote the article and they wrote the
20 title to the article. I was -- {audio
21 interruption} -- for the word choice.

22 QUESTIONS BY MR. LANIER:

23 Q. All right. So can we at least
24 agree like this, that you repeatedly post on
25 the opioid epidemic using those words?

1 MR. HYNES: Objection. Form.

2 QUESTIONS BY MR. LANIER:

3 Q. Fair?

4 A. There are a few postings that
5 have that language in it -- {audio
6 interruption} the one that we referenced --

7 Q. You are --

8 A. -- was not written by me. It
9 was --

10 Q. You were cutting in and out.

11 MR. HYNES: Yeah, you're
12 breaking up.

13 QUESTIONS BY MR. LANIER:

14 Q. Make sure we're clear.

15 Can we at least agree that you
16 post on the opioid epidemic, sometimes with
17 your own words, sometimes using words from
18 other people that you grab and post, fair?

19 MR. HYNES: Objection. Form.

20 THE WITNESS: So I post on many
21 topics. The words "opioid epidemic,"
22 as we've talked about, appears in the
23 language on some of those posts,
24 whether it's language that I've
25 written or it's language from others.

1 THE WITNESS: Thank you.

2 I see that that language -- I
3 see that that language is accurate to
4 what's written on the page.

5 QUESTIONS BY MR. LANIER:

6 Q. Okay. So within the context of
7 this, you do not agree, and I need to make
8 that note on here, Nicole Harrington
9 disagrees.

10 So you, Nicole Harrington,
11 believe that CVS did all it could to reduce
12 the growth of this tragic problem, correct?

13 A. Within the scope of our area of
14 responsibility, yes.

15 Q. All right. Okay. Then I want
16 to divide this up into three different areas
17 to reference now.

18 First, how familiar are you
19 with the relationship that CVS had with
20 Purdue, the manufacturer of OxyContin?

21 A. I am not very familiar with
22 that.

23 Q. So I'm going to suggest to you
24 that I believe CVS and Purdue were
25 hand-in-hand on opioid issues going back as

1 far as 2001.

2 You don't have great
3 familiarity with that right now; is that fair
4 to say?

5 MR. HYNES: Objection.
6 Objection to form. Objection.
7 Foundation. Objection to counsel
8 testifying.

9 THE WITNESS: I'm not familiar
10 with the relationship between CVS and
11 Purdue, to the best of my
12 recollection.

13 QUESTIONS BY MR. LANIER:

14 Q. But wouldn't you agree to the
15 extent that you're in charge of regulating --
16 not regulating, of -- let's get the words
17 just right.

18 To the extent your
19 responsibilities include educating others on
20 regulatory compliance issues and making
21 presentations that might be influential in
22 negotiating reduced civil penalties,
23 mitigating regulatory risks, don't you think
24 that the relationship the company has with
25 manufacturers of opiates might be important